

**IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF INDIANA, HAMMOND DIVISION**

Caitlin V. Neal,

Plaintiff,

v.

Operators of the Digital Properties Set Forth in
Exhibit 1,

Defendants.

Case No: 2:24-cv-00263-GSL-AZ

Dist. Judge Gretchen S. Lund

Mag. Judge Abizer Zanzi

Plaintiff's Motion for Leave to File Renewed Motion for TRO

NOW COMES Plaintiff Caitlin V. Neal (“Plaintiff”), by and through Plaintiff’s undersigned counsel, and hereby requests leave to file a renewed *ex parte* motion for entry of a temporary restraining order, including a temporary asset restraint (“Motion for Leave”). In support of the Motion for Leave, Plaintiff states as follows:

1. Plaintiff had previously sought similar relief on November 8, 2024 [DE 14], which the Court denied. [DE 20].
2. Plaintiff sought reconsideration of the denial of the TRO [DE 22], which the Court also denied, making clear that the denial was without prejudice. [DE 25].
3. Since the Court’s denial of the TRO and reconsideration therefor, the Court has granted similar relief as that requested by Plaintiff to other Lanham Act plaintiffs. *See, e.g., Glitch Prods. Pty Ltd v. The P’ships, et al.*, Case No. 2:25-cv-00161, DE 17 (N.D. Ind. Apr. 11, 2025) (LUND, J.); *Superhype Tapes Limited v. The P’ships, et al.*, Case No. 2:25-cv-00161, DE 20 (N.D. Ind. June 17, 2025) (LUND, J.); *Sesame Workshop v. The P’ships, et al.*, Case No. 2:25-cv-00375, DE 24 (N.D. Ind. Aug. 27, 2025) (LUND, J.).
4. While the cases cited above involved federal trademark registrations (unlike this case, which involves the unauthorized use of an individual’s identity in a manner that is likely

to create consumer confusion), the underlying principles for why ex parte temporary injunctive relief (and subsequent preliminary injunctive relief) would be appropriate are the same. *See 3M Co. v. Cont'l Diamond Tool Corp.*, No. 1:21-CV-274-HAB, 2022 WL 2355481, at *4 (N.D. Ind. June 30, 2022) (“In the context of false endorsement claims . . . the ‘mark’ at issue is the [individual’s] identity.”).

5. Plaintiff and Plaintiff’s counsel are conscious of their obligation not to unnecessarily multiply pleadings in this case, and therefore desire to ensure that the Court would be amenable to a renewed motion based on essentially identical grounds as those asserted before. Plaintiff and Plaintiff’s counsel therefore request the Court’s permission to do so.

Dated: September 11, 2025

Respectfully submitted,

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